

EXHIBIT B

Excerpts From Deposition Transcript of Plaintiff Parnell Colvin

EXHIBIT B

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEVADA

PARNELL COLVIN,)
)
 Plaintiff,)
)
 vs.) CASE NO. 2:14-CV-00761-JCM-PAL
)
 M.J. DEAN CONSTRUCTION,)
 INC.)
)
 Defendant.)
 _____)

VIDEORECORDED DEPOSITION OF PARNELL COLVIN

Las Vegas, Nevada

July 15, 2021
10:00 a.m. (PST)

REPORTED BY:
MICHAEL A. BOULEY, RDR
NVCCR #960



1 VIDEORECORDED DEPOSITION OF PARNELL COLVIN, was
2 taken on July 15, 2021, at 10:00 a.m. at Howard & Howard,
3 3800 Howard Hughes Parkway, Suite 1000, Las Vegas,
4 Nevada, before Michael A. Bouley, RDR, Nevada Certified
5 Court Reporter No. 960.

6

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18

19 Also Present:

20 Abdul Alotaibi, legal videographer

21 Kevin Gutierrez

22 Tommy Glidewell

23

24

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1	INDEX		
2	WITNESS		PAGE
3	PARNELL COLVIN		
4	Examination by Mr. Rosenthal		5
5	Examination by Mr. Marks		225
6	Examination by Mr. Rosenthal		238
7			
8			
9			
10	EXHIBITS		
11	NUMBER	DESCRIPTION	PAGE
12	A	First Amended Complaint.....	9
13	B	Text Messages	51
14	C	Dispatch Referral	63
15	D	Employment Documents	65
16	E	Code of Safe Practices & Anti-Drug and	
17		Harassment Policies	71
18	F	Office Policy Manual	75
19	G	Benefits document	79
20	H	Employee Incident Investigation Report ...	117
21	I	Photograph	166
22	J	Photograph	173
23	K	Email	199
24	L	Termination Notice	203
25	M	Email from T. Glidewell	207



1 Q. Did you show Tony what you saw on the restroom
2 on January 3, 2020?

3 A. No.

4 Q. When did you show Tony what you saw in the
5 restroom?

6 A. I never showed Tony.

7 Q. So you only showed Julian?

8 A. Yes.

9 Q. Why didn't you show Tony?

10 A. Because Tony was just walking by, and I just
11 said, You need to go look at what was -- what's in the
12 restroom. And they did that, and they -- Carson taped it
13 off.

14 Q. How do you know that Tony went to look at what
15 was in the restroom?

16 A. Because he came back to me and said, That's some
17 fucked up shit.

18 Q. Do you know if anything was done about it?

19 A. Yes.

20 Q. What was done?

21 A. They was cleaning it.

22 Q. Who is they?

23 A. Me and Ricky.

24 Q. Do you know if the person or persons who wrote
25 what's contained on Exhibit I that was in the restroom



1 area, if the people or person who did this was an M.J.
2 Dean employee?

3 **A. I don't know.**

4 Q. So it could have been an AECOM employee or
5 somebody else from a different company. Right?

6 **A. Possible.**

7 Q. There were other employees on the jobsite other
8 than M.J. Dean employees. Correct?

9 **A. Yes.**

10 Q. Again, you don't know who wrote these things on
11 Exhibit I. Right?

12 **A. Right. I don't know.**

13 Q. Do you know if, as a result of your complaints
14 to Tony and Julian about what was written in the restroom
15 that's marked as Exhibit I, that it was -- this was
16 resolved to your satisfaction?

17 **A. I don't know.**

18 Q. You don't know whether it was resolved to your
19 satisfaction?

20 **A. I just reported it.**

21 Q. Okay. Do you feel it was resolved -- were you
22 happy with the result that it was removed?

23 **A. Yes.**

24 MR. MARKS: Object to the form.

25 BY MR. ROSENTHAL:



1 **get something. So it's the closest restroom. So you go**
2 **into the closest restroom. At that time, that was the**
3 **closest restroom.**

4 Q. So you never went back to that restroom for the
5 next four months of your employment. Is that correct?

6 A. **Correct.**

7 Q. And so you don't know if M.J. Dean took any
8 action in response to your oral complaints to Julian and
9 Tony about Exhibit J. Right?

10 A. **Correct.**

11 Q. You don't know who wrote the contents of what's
12 in Exhibit J. Right?

13 A. **I don't know.**

14 Q. You don't know if the person who wrote Black
15 laborers equals lazy with an exclamation mark was an M.J.
16 Dean employee or somebody else. Right?

17 A. **Correct.**

18 Q. Now, the photographs marked as Exhibits I and J
19 were only disclosed during this litigation to me on May
20 21st, 2021. Do you know why that -- why that is?

21 A. **Well, prior counsel, I think you like know this,**
22 **but they informed me that -- well, actually, I read your**
23 **pleading online, so I was able to see that you guys had**
24 **requested that you were -- it would be photos at the last**
25 **minute.**



1 BE IT KNOWN that the foregoing proceedings were
2 taken before me; that the witness before testifying was
3 duly sworn to testify to the whole truth; that the
4 foregoing pages are a full, true and accurate record of
5 the proceedings, all done to the best of my skill and
6 ability; that the proceedings were taken down by me in
7 stenographic shorthand and thereafter reduced to print
8 under my direction.

9 I CERTIFY that I am in no way related to any of
10 the parties hereto, nor am I in any way interested in the
11 outcome thereof.

12

13

14

15 (X) Review and signature was requested.

16 () Review and signature was waived.

17 () Review and signature was not requested.

18

19

Michael A. Bouley

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Michael A. Bouley, RDR
Nevada Certified Reporter, #960

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